

1 Stacey M. Leyton (SBN 203827)
2 Barbara J. Chisholm (SBN 224656)
3 Danielle Leonard (SBN 218201)
4 ALTSHULER BERZON LLP
5 177 Post Street, Suite 300
6 San Francisco, CA 94108
7 Tel: (415) 421-7151
8 Fax: (415) 362-8064
9 sleyton@altber.com
10 bchisholm@altber.com
11 dleonard@altber.com

12 Elena Goldstein (pro hac vice)
13 Skye Perryman (pro hac vice)
14 Tsuki Hoshijima (pro hac vice)
15 DEMOCRACY FORWARD FOUNDATION
16 P.O. Box 34553
17 Washington, DC 20043
18 Tel: (202) 448-9090
19 Fax: (202) 796-4426
20 egoldstein@democracyforward.org
21 sperryman@democracyforward.org
22 thoshijima@democracyforward.org

23 *Attorneys for Plaintiffs*

24 [Additional counsel and affiliations listed on signature page]

25 UNITED STATES DISTRICT COURT
26 FOR THE NORTHERN DISTRICT OF CALIFORNIA
27 SAN FRANCISCO DIVISION

28 AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO,
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**PLAINTIFFS' RESPONSE TO
DEFENDANTS' NOTICE OF
COMPLIANCE**

INTRODUCTION

In response to Defendants' Notice of Compliance (ECF 155), Plaintiffs respectfully request that the Court issue an order (1) confirming that the State Department's April 22, 2025 announced reorganization and related reductions-in-force (RIFs) and the Department of Housing and Urban Development ("HUD")'s May 2025 termination of probationary employees fall within the scope of this Court's injunctive relief ordered on May 9, 2025 (ECF 85) and May 22, 2025 (ECF 124); and (2) requiring Defendants to file a further compliance report confirming and identifying specific additional actions taken by the State Department and HUD to comply with this Court's orders.

Defendants have not moved this Court for relief from the preliminary injunction, but instead presented declarations stating that the actions of the State Department and HUD are entirely unrelated to President Trump's Executive Order No. 14210 ("EO") and the implementing OMB/OPM Memorandum. However, the contemporaneous documents from each agency, as well as from OMB/OPM, prove otherwise, and defeat the agencies' assertion that their actions were not in fact taken to implement the EO. Plaintiffs address below the reasons that the actions planned or taken by the State Department and HUD are covered by this Court's injunction prohibiting actions to implement or enforce the EO.

BACKGROUND

This Court's May 22 preliminary injunction, like the May 9, 2025 TRO that preceded it, stays and enjoins Defendants from "taking any actions to implement or enforce sections 3(c) and 3(e) of Executive Order 14210 or the February 26, 2025 OMB/OPM Memorandum, including but not limited to... (4) any further implementation of ARPPs, including but not limited to the following actions, to the extent they are taken to implement Executive Order 14210 and/or the OMB/OPM Memorandum:

- (a) execution of any existing RIF notices (including final separation of employees),
- (b) issuance of any further RIF notices,
- (c) placement of employees on administrative leave, and
- (d) transfer of functions or programs between the agency defendants."

ECF 124 at 48.

1 to address foreign policy needs, not to respond to any Executive Order.” ECF 155 at 1. The
 2 narrative provided by Mr. Holler paints a picture of a reorganization process and RIF plans
 3 developed entirely internally by the State Department without involvement of OMB and
 4 “independent” of the EO. ECF 155-2. Notably, Mr. Holler provides the Court with no documents,
 5 including the State Department ARRP, to support that narrative. *See id.*

6 Contrary to Mr. Holler’s representations to this Court, however, the State Department’s
 7 actual documents and public statements, *including documents provided to Congress*, show that the
 8 reorganization announced on April 22, 2025 and planned for imminent implementation was
 9 undertaken “pursuant to” the EO. Specifically, on May 29, 2025, the State Department provided
 10 multiple appropriations committees and subcommittees of the U.S. House of Representatives and
 11 U.S. Senate a “spend plan” pertaining to the current fiscal year 2025 budget. Supp. Leonard Decl.,
 12 Ex. A. That document stated:

13 In addition, ***pursuant to E.O. 14210 Implementing the President’s “Department of***
 14 ***Government Efficiency” Workforce Optimization Initiative, the agency***
 15 ***reorganization plan was released on April 22*** and, subject to additional review, may
 involve other separation expenses, including Reduction in Force (RIF) costs.

16 *Id.* (emphasis added). Thus, the State Department told Congress less than two weeks ago that the
 17 April 22 reorganization, which includes imminent planned RIFs, was done “pursuant to” the EO,
 18 contrary to the statements of Mr. Holler submitted to this Court.

19 Consistent with the “spend plan” description, the State Department’s Fiscal Year 2026
 20 Congressional Budget Justification (“CBJ”), which the Department recently provided to Congress,
 21 states:

22 ***Pursuant to E.O. Implementing the President’s ‘Department of Government***
 23 ***Efficiency’ Workforce Optimization Initiative, this request includes the projected***
 24 ***impact of the Department’s Agency RIF and Reorganization Plan (ARRP) reductions***
 25 totaling \$173.4 million (of which, \$137.9 million is AmSals and \$35.5 million is bureau-
 managed) reflected across applicable DP bureaus for office closures and functions to be
 abolished.

26 Diplomatic Programs - Ongoing Operations:

27 ...

28 \$173.4 million reduction reflects **the projected savings in salary and position support costs for personnel related to the ARRP.**

1 *Id.*, Ex. B (emphases modified).¹

2 Those State Department statements, made in official submissions to Congress, expressly
3 connect State’s reorganization plan to the EO and expressly acknowledge the “projected impact” of
4 the Department’s ARRP “reductions” taken “[p]ursuant to” Executive Order 14210.

5 Those congressional documents are consistent with other contemporaneous statements
6 made by the State Department regarding its reorganization plan, including:

- 7 • April 27, 2025 Secretary of State Marco Rubio interview with Kristen Welker of
8 NBC Meet the Press: “But this is a reorganization that should have been done 10,
9 15 years ago. Multiple secretaries of state from both—appointed by presidents both
10 Democrat and Republican would have loved to have done it. **I just happen to be
11 fortunate to work for a president that allowed us to do it, that actually asked us
12 to do it**, and I’m excited about it. (Second Supp. Hunter Decl., Ex. A) (emphasis
13 added).
- 14 • April 22, 2025 State Department Press Briefing: “[T]his is a — from an executive
15 order . . . a whole-of-government — **every department looking at how they can
16 make their department more efficient, less burdensome, less bureaucratic. This
17 is the State Department’s version of that.**” (ECF 148-1, Ex. A) (emphasis added).
- 18 • April 22, 2025 State Department Reorganization Fact Sheet: “As part of the plan,
19 the Under Secretaries will also submit a path to reducing staff in domestic offices by
20 15 percent, **consistent with the President’s Workforce Optimization Initiative.**”
21 (ECF 148-1, Ex. B) (emphasis added).
- 22 • On May 13, 2025, after the Court issued the TRO, the State Department revised its
23 reorganization fact sheet *to remove the reference* to the Workforce Optimization
24 Initiative. (ECF No. 148-1, Ex. C).

25 Further, Plaintiffs’ TRO and preliminary injunction filings submitted evidence regarding
26 RIF notices that the State Department had already issued to employees in the Counter Foreign
27 Information Manipulation and Interference (R/FIMI). ECF 37-20 ¶12. Mr. Holler admits that the
28 Department closed that office and, on April 16, 2025, issued RIF notices to these employees. ECF
155-2 ¶16. He then states the following:

26 ¹ Plaintiffs note that the State Department’s Congressional Budget Justification was
27 developed in close collaboration with—including review and clearance by—OMB. *See, e.g.*, OMB
28 Circular No. A–11 at 22-2 to 22-3 (2024) (describing “Clearance of budget materials for the
Congress,” including for “[a]ll budget justifications”); *id.* at 22-5 (“You must submit all budget
justification materials to OMB for clearance before transmitting them to the Congress.”) (available
at <https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf>).

As outlined in several public statements and media appearances, the intended closure of FIMI was unrelated to the broader reorganization and entirely distinct from any broader workforce reduction goals.

ECF 155-2 ¶16. Again, however, Mr. Holler’s statement is contradicted by contemporaneous State Department documents. In an email to R/FIMI employees on April 23, 2025, a State Department human resources officer explained that the closure of the R/FIMI “*aligns to the Department’s projected plans in compliance with Executive Order 14210, ‘Implementing the President’s ‘Department of Government Efficiency’ Workforce Optimization Initiative’*” and “[t]he Department **consequently** requested and **received approval from OPM** permission to provide less than 60 days’ notice for the Reduction in Force.” Second Supp. Hunter Decl., Ex. B (emphases added).²

Mr. Holler also admits that the State Department submitted an Agency RIF and Reorganization Plan to OMB/OPM pursuant to the EO and instructions in the implementing OMB/OPM Memorandum, but tellingly does not provide the ARRP to the Court. ECF 155-2 ¶13. He represents that the State Department provided “only summary information about certain Department goals” in the ARRP it submitted pursuant to the OMB/OPM Memorandum (per that Memorandum, for “approval,” ECF 37-1, Ex. B), and says further that “no specific reorganization plans, RIF competitive areas, or other associated details were provided in the Department’s submission.” *Id.* He later claims that the State Department stopped communicating with OMB/OPM *after* the April 22 public announcement of the reorganization plan—but that of course does not shed light on the earlier submission and/or approval by OMB/OPM of that ARRP prior to the April 22 public announcement. *Id.* at ¶¶19-21. Notably, Mr. Holler does *not* state whether the State Department ARRP included the Department’s reorganization plan announced April 22, or whether OMB/OPM approved the State Department’s reorganization plans.

With respect to the earlier period for ARRP submission and approval prior to the April 22 announcement, again the contemporaneous documents undermine Mr. Holler’s narrative. As of at

² Plaintiffs submitted evidence at the preliminary injunction stage showing that other agencies were similarly eliminating offices and programs while citing other Executive Orders, and then issuing RIF notices to eliminate the positions within those offices and programs pursuant to the EO at issue in this case. ECF 70-2 & Exs. A-C.

1 least February 21, 2025, the State Department was preparing the reorganization plan required by
 2 the EO. State Department communications stated: “The President’s Executive Order of February
 3 11, 2025 entitled: Implementing the President’s “Department of Government Efficiency”
 4 Workforce Optimization Initiative requires agencies to submit to the Director of OMB a report that
 5 identifies any statutes that establish the agency, or subcomponents of the agency, as statutorily
 6 required entities. The report shall discuss whether the agency or any of its subcomponents should
 7 be eliminated or consolidated.” Second Supp. Hunter Decl., Ex. C (directions from the “Senior
 8 Advisor to the Director General, and Director for Workforce Innovation, Bureau of Global Talent
 9 Management (GTM)” describing the “ACTION REQUIRED” by “all EX Offices” to create the
 10 plan required by the EO).

11 The Department’s budget documents also belie this narrative. As discussed, those
 12 documents are necessarily prepared in conjunction with OMB. *Supra*, n.1. The CBJ for FY 2026
 13 calculates the precise cost of the implementation of the Department’s ARRP “pursuant to” the EO,
 14 as quoted above. Supp. Leonard Decl., Ex. B (“... reductions totaling \$173.4 million (of which,
 15 \$137.9 million is AmSals and \$35.5 million is bureau-managed) reflected across applicable DP
 16 bureaus for office closures and functions to be abolished.”). The discussion between OMB and the
 17 State Department regarding the current fiscal year spending and proposed spending for next year,
 18 which are *necessarily* impacted by these reorganization plans, and which the State Department
 19 admits it intends to imminently implement (ECF 155-2 ¶23), plainly was ongoing during April
 20 2025 if not earlier.³

21 Finally, it does not matter whether Secretary Rubio and his advisors began planning a State
 22 Department reorganization before or after the President’s Executive Order. The reorganization
 23 plan that the State Department ultimately announced on April 22, 2025 was, as reflected in the
 24 State Department’s own words, *pursuant to* that Order.

25
 26
 27 ³ *E.g.*, Washington Post, *Trump plan would slash State Dept. funding by nearly half, memo*
 28 *says* (April 14, 2025), available at <https://www.washingtonpost.com/national-security/2025/04/14/state-department-budget-cuts-trump-rubio/>

As shown previously (ECF 148), the preliminary injunction plainly applies to the State Department reorganization plan and related RIFs. Defendants' submission fails to show that the State Department reorganization announced on April 22, 2025 was not, as a matter of fact, an action implementing the EO at issue in this case, and that State therefore should be relieved from complying with that injunction. Defendants cannot tell Congress one thing and this Court another.

2. HUD

HUD admits that "in May 2025" it terminated 76 probationary employees. ECF 155-1 at ¶4.⁴ Defendants do not reveal the dates of these terminations, or whether they occurred after this Court's May 9 or May 22 injunctions (however, as Plaintiffs previously demonstrated to the Court, those terminations occurred on or around May 15, *see* ECF 148-1; ECF 155). Defendants merely contend, relying on the Declaration of HUD Chief Human Capital Officer Lori Michalksi, that "HUD's termination of 76 of 312 probationary employees was not pursuant to or to implement, and was entirely independent from, sections 3(c) and 3(e) of Executive Order 14210 and the February 26, 2025, OMB/OPM Memorandum." ECF 155 at 1.

However, the documents created by OMB/OPM to enforce and implement the EO direct agencies to use all "tools" available to them in their ARRP to achieve the President's workforce reduction directives, and specifically list "Probationary Employees" as one category of "FTE Reductions Attributed to Specific Strategies" that agencies should implement pursuant to the EO. *See* ECF 37-1, Ex. B; ECF 96-1, Ex. D. Defendants do not deny that the probationary terminations at issue occurred on or around May 15, which is after March 13 and April 14 deadlines for HUD to submit its ARRP to OMB/OPM for approval.

Plaintiffs therefore reasonably requested that Defendants explain whether HUD included the termination of probationary employees in its ARRP. ECF 148-1, Ex. D. Notwithstanding the discussion of that request at the status conference, Defendants' Declaration pointedly does not address the content of HUD's ARRP, nor does it deny that the HUD ARRP included, as directed

⁴ In prior meet and confer emails, defense counsel previously stated that HUD had terminated "approximately 79" probationary employees. ECF 148-1 Ex. D. Regardless of whether the correct number is 76 or 79, those terminations are covered by the preliminary injunction.

1 by OMB/OPM, the termination of probationary employees as a “strategy” or “tool” to reduce the
 2 number of employees. The Michalksi Declaration states only that the terminations were pursuant
 3 to and consistent with a different Executive Order, and not the EO at issue in this case. But the
 4 Declaration provides no documentation or other evidence to support that assertion or to otherwise
 5 counter the OMB/OPM documents that expressly identify the termination of probationary
 6 employees as a tool to implement the EO.

7 Moreover, nothing about the two Executive Orders states that they are mutually exclusive.
 8 A number of the “tools” or “strategies” that the OMB/OPM Memorandum instructs agencies to use
 9 in their ARRP’s to achieve workforce reduction goals find their source authority elsewhere (for
 10 example, Defendants contend that agency RIF authority comes from 5 U.S.C. §3502, not the EO).⁵
 11 The record evidence already includes other agency actions (such as the elimination of programs or
 12 functions) that were taken pursuant to other Executive Orders, *as well as* being expressly included
 13 in actions to effectuate the workforce reduction goals of the EO at issue here. *Supra*, n.2 (DOL
 14 elimination of Office of Federal Contract Compliance Programs pursuant to different Executive
 15 Order, and employees issued RIF notices expressly to effectuate this EO). Simply stating that an
 16 action was also taken under the authority of a different Executive Order therefore does not prove
 17 that the action did not also implement the EO at issue here.

18 Furthermore, the assessment that HUD asserts it conducted, concluding that these
 19 employees “would not advance the *organizational goals* of the Agency and would not advance the
 20 efficiency of the service,” ECF 155-1 ¶4, appears to directly reference the ongoing efforts to
 21 reorganize pursuant to this EO. If the EO set the standard by which these organizational goals are
 22 measured, then it was a cause of the probationary employee terminations at issue. This further
 23 undermines Defendants’ assertion that HUD’s assessments were “independent” of the EO at issue
 24 in this case (the purpose of which is to “transform” every federal agency, including HUD, and
 25 plainly sets the “organizational goals” against which the necessity for these positions were
 26 measured).

27
 28 ⁵ Plaintiffs do not concede the legality of the President’s April 24, 2025 Executive Order
 entitled “Strengthening Probationary Periods in the Federal Service.”

1 Finally, Plaintiffs note that the description of the injunction provided by Ms. Michalski is
 2 underinclusive. She says “I understand that the Temporary Restraining Order and the Preliminary
 3 Injunction enjoined and/or stayed the defendant agencies, which includes HUD, from taking any
 4 actions to implement or enforce sections 3(c) and 3(e) of Executive Order 14210 or the February
 5 26, 2025, OMB/OPM Memorandum, including by further implementation of Agency RIF and
 6 Reorganization Plans (ARRPs) *by executing any existing RIF notices or issuing any further RIF*
 7 *notices.”* ECF 155-1 at ¶3 (emphasis added). This Court, however, enjoined *all* implementation of
 8 the ARRPs, “including but not limited to” RIFs and other actions. ECF 124 at 48. Defendants did
 9 not correct HUD’s mischaracterization of the Order, but instead submitted it to this Court.
 10 Defendants’ prior “compliance” report consisted of a counsel declaration claiming privilege for the
 11 actual instructions provided to agencies regarding the preliminary injunction. ECF 141-1. To the
 12 extent that HUD’s actions resulted from this underinclusive understanding of this Court’s
 13 injunction, Defendants have all the more reason to take corrective action.

14 In sum, by failing to provide this Court with direct evidence (including the best evidence,
 15 which would be the content of the HUD ARRP), Defendants have not established that the May
 16 2025 termination of probationary employees was not, as directed by OMB/OPM, taken as a
 17 strategy to implement the EO. Those terminations were therefore enjoined by this Court’s
 18 preliminary injunction. HUD should notify the Court of corrective measures taken to comply with
 19 this Court’s orders with respect to those probationary employees.

20 **3. Action Requested**

21 As previously discussed, Defendants have not moved for relief from the injunction, and
 22 have not given this Court any valid basis to alter its preliminary injunction order. Plaintiffs
 23 respectfully request the Court issue an order confirming the application of the injunction to the
 24 impending State Department RIFs and reorganization announced on April 22, 2025 and to HUD’s
 25 May 2025 termination of probationary employees, and order Defendants to submit a new
 26 compliance report showing actions taken to bring these agencies into compliance.

1 Respectfully submitted,

2 DATED: June 11, 2025

3 Stacey M. Leyton
4 Barbara J. Chisholm
5 Danielle E. Leonard
6 Corinne F. Johnson
7 Alice X. Wang
8 Robin S. Tholin
9 Aaron Schaffer-Neitz
10 ALTSHULER BERZON LLP
11 177 Post St., Suite 300
12 San Francisco, CA 94108
13 Tel: (415) 421-7151
14 sleyton@altshulerberzon.com
15 bchisholm@altshulerberzon.com
16 dleonard@altshulerberzon.com

17 By: /s/ Danielle Leonard

18 *Attorneys for All Union and Non-Profit Organization*
19 *Plaintiffs*

20 Elena Goldstein (pro hac vice)
21 Skye Perryman (pro hac vice)
22 Tsuki Hoshijima (pro hac vice)
23 DEMOCRACY FORWARD FOUNDATION
24 P.O. Box 34553
25 Washington, D.C. 20043
26 Tel: (202) 448-9090
27 Fax: (202) 796-4426
28 egoldstein@democracyforward.org
sperryman@democracyforward.org
thoshijima@democracyforward.org

By: /s/ Tsuki Hoshijima

Attorneys for All Union and Non-Profit Organization
Plaintiffs (except NRDC) and for Plaintiffs City of
Chicago, IL; Martin Luther King, Jr. County, WA;
Harris County, TX; and City of Baltimore, MD

Jules Torti (pro hac vice)
PROTECT DEMOCRACY PROJECT
82 Nassau St., #601
New York, NY 10038

Erica J. Newland (pro hac vice)
Jacek Pruski (pro hac vice)
PROTECT DEMOCRACY PROJECT
2020 Pennsylvania Ave., N.W., Suite 163
Washington, D.C. 20006
Tel: 202-579-4582
jules.torti@protectdemocracy.org
erica.newland@protectdemocracy.org
jacek.pruski@protectdemocracy.org

By: /s/ Jacek Pruski

*Attorneys for All Union and Non-Profit Organization
Plaintiffs (except NRDC)*

Norman L. Eisen (pro hac vice)
Spencer W. Klein (pro hac vice)
STATE DEMOCRACY DEFENDERS FUND
600 Pennsylvania Avenue SE #15180
Washington, D.C. 20003
Tel: (202) 594-9958
Norman@statedemocracydefenders.org
Spencer@statedemocracydefenders.org

By: /s/ Norman L. Eisen

*Attorneys for All Union and Non-Profit Organization
Plaintiffs (except NRDC)*

Rushab Sanghvi (SBN 302809)
AMERICAN FEDERATION OF GOVERNMENT
EMPLOYEES, AFL-CIO
80 F Street, NW
Washington, D.C. 20001
Tel: (202) 639-6426
Sanghr@afge.org

By: /s/ Rushab Sanghvi

*Attorneys for Plaintiffs American Federation of
Government Employees, AFL-CIO (AFGE) and AFGE
locals*

Teague Paterson (SBN 226659)
Matthew Blumin (pro hac vice)

1 AMERICAN FEDERATION OF STATE, COUNTY,
2 AND MUNICIPAL EMPLOYEES, AFL-CIO
1625 L Street, N.W.
3 Washington, D.C. 20036
Tel: (202) 775-5900
4 TPaterson@afscme.org
MBlumin@afscme.org
5

6 By: /s/ Teague Paterson

7 *Attorneys for Plaintiff American Federation of State*
8 *County and Municipal Employees, AFL-CIO*
9 *(AFSCME)*

10 Steven K. Ury (SBN 199499)
SERVICE EMPLOYEES INTERNATIONAL
11 UNION, AFL-CIO
1800 Massachusetts Ave., N.W.
12 Washington, D.C. 20036
Tel: (202) 730-7428
13 steven.ury@seiu.org

14 By: /s/ Steven K. Ury

15 *Attorneys for Plaintiff Service Employees*
16 *International Union, AFL-CIO (SEIU)*

17
18 David Chiu (SBN 189542)
City Attorney
19 Yvonne R. Meré (SBN 175394)
Chief Deputy City Attorney
20 Mollie M. Lee (SBN 251404)
Chief of Strategic Advocacy
21 Sara J. Eisenberg (SBN 269303)
Chief of Complex and Affirmative Litigation
22 Molly J. Alarcon (SBN 315244)
23 Alexander J. Holtzman (SBN 311813)
Deputy City Attorneys
24 OFFICE OF THE CITY ATTORNEY FOR THE
CITY AND COUNTY OF SAN FRANCISCO
25 1390 Market Street, 7th Floor
26 San Francisco, CA 94102
molly.alarcon@sfcityatty.org
27 alexander.holtzman@sfcityatty.org

28 By: /s/ Alexander Holtzman

Attorneys for Plaintiff City and County of San Francisco

Tony LoPresti (SBN 289269)
COUNTY COUNSEL
Kavita Narayan (SBN 264191)
Meredith A. Johnson (SBN 291018)
Raphael N. Rajendra (SBN 255096)
Hannah M. Godbey (SBN 334475)
OFFICE OF THE COUNTY COUNSEL
COUNTY OF SANTA CLARA
70 West Hedding Street, East Wing, 9th Floor
San José, CA 95110
Tel: (408) 299-5900
Kavita.Narayan@cco.sccgov.org
Meredith.Johnson@cco.sccgov.org
Raphael.Rajendra@cco.sccgov.org
Hannah.Godbey@cco.sccgov.org

By: /s/ Tony LoPresti

Attorneys for Plaintiff County of Santa Clara, Calif.

David J. Hackett (pro hac vice)
General Counsel to King County Executive & Special
Deputy Prosecutor
Alison Holcomb (pro hac vice)
Deputy General Counsel to King County Executive &
Special Deputy Prosecutor
Erin King-Clancy (pro hac vice app. forthcoming)
Senior Deputy Prosecuting Attorney
OFFICE OF KING COUNTY PROSECUTING
ATTORNEY LEESA MANION
401 5th Avenue, Suite 800
Seattle, WA 98104
(206) 477-9483
David.Hackett@kingcounty.gov
aholcomb@kingcounty.gov
aclancy@kingcounty.gov

By: /s/ David J. Hackett

Attorneys for Plaintiff Martin Luther King, Jr. County

Sharanya Mohan (CABN 350675)

PUBLIC RIGHTS PROJECT

490 43rd Street, Unit #115

Oakland, CA 94609

Tel: (510) 738-6788

sai@publicrightsproject.org

By: /s/ Sharanva Mohan

*Attorney for Plaintiffs Baltimore, MD, Chicago, IL,
Harris County, TX, and King County, WA*

Christian D. Menefee

Harris County Attorney

Jonathan G.C. Fombonne (pro hac vice)

Deputy County Attorney and First Assistant

Tiffany Bingham (pro hac vice app. forthcoming)

Managing Counsel

Sarah Utley (pro hac vice app. forthcoming)

Division Director – Environmental Division

Bethany Dwyer (pro hac vice app. forthcoming)

Deputy Division Director - Environmental Division

R. Chan Tysor (pro hac vice app. forthcoming)

Senior Assistant County Attorney

Alexandra “Alex” Keiser (pro hac vice)

Assistant County Attorney

1019 Congress, 15th Floor

Houston, Texas 77002

Tel: (713) 274-5102

Fax: (713) 437-4211

jonathan.fombonne@harriscountytexas.gov

tiffany.bingham@harriscountytexas.gov

sarah.utley@harriscountytexas.gov

bethany.dwyer@harriscountytexas.gov

chan.tysor@harriscountytexas.gov

alex.keiser@harriscountytexas.gov

By: /s/ Jonathan G.C. Fombonne

Attorneys for Plaintiff Harris County, Texas

Mary B. Richardson-Lowry,

Corporation Counsel of the City of Chicago

Stephen J. Kane (IL ARDC 6272490) (pro hac vice
app. forthcoming)

Rebecca A. Hirsch (IL ARDC 6279592) (pro hac
vice)

Lucy Prather (IL ARDC 6337780) (pro hac vice)
City of Chicago Department of Law,
Affirmative Litigation Division
121 N LaSalle Street, Suite 600
Chicago, Illinois 60602
Tel: (312) 744-6934
Stephen.kane@cityofchicago.org
Rebecca.Hirsch2@cityofchicago.org
Lucy.Prather@cityofchicago.org

By: /s/ Stephen J. Kane

Attorneys for Plaintiff City of Chicago

Ebony M. Thompson
Baltimore City Solicitor
Sara Gross (pro hac vice app. forthcoming)
Chief of Affirmative Litigation
Baltimore City Department of Law
100 N. Holliday Street
Baltimore, Maryland 21202
Tel: (410) 396-3947
sara.gross@baltimorecity.gov

By: /s/ Sara Gross

Attorneys for Plaintiff City of Baltimore